

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT
FACT SHEET FOR A RCRA HAZARDOUS WASTE PERMIT- RENEWAL
US ECOLOGY NEVADA (USEN) INC.
EPA ID #NVT330010000
DRAFT PERMIT NUMBER NEV HW0019



The Nevada Division of Environmental Protection (NDEP) has developed this Fact Sheet for the Resource Conservation and Recovery Act (RCRA) Permit renewal which NDEP intends to approve for the US Ecology NV Inc. facility in Beatty, Nevada. This Fact Sheet has been prepared in accordance with the public notice requirements of Nevada Administrative Code (NAC) 444.8632 and Chapter 40 Code of Federal Regulations (CFR) Section §124.8. The purpose of this Fact Sheet is to provide interested citizens and other governmental agencies a summary description of the principal facts and significant issues NDEP has considered in reviewing the Application for and development of a RCRA Permit for the management of Hazardous Waste and extending the existing permit.

FACILITY DESCRIPTION

The facility is located on an 80-acre site, which is owned by the state of Nevada. In addition, the state of Nevada leases a 400-acre buffer zone surrounding the 80-acre site from the U.S. Bureau of Land Management. The facility consists of:

- Four (6) Container Storage Units;
- Five (5) PCB Storage Tanks;
- One (1) Leachate Storage Tank;
- One (1) Evaporation Tank;
- Three (3) Batch Stabilization Tanks;
- One (1) Subpart - X "Low Temperature Thermal Desorption Unit (LTTD);
- Three (3) Condensate Storage Tanks – LTTD Operations
- Three (3) Subtitle C landfills consisting of Trench 10 (closed), Trench 11 (existing operating trench), and Trench 12 (proposed) with a combined design capacity of 2,630 acre-feet.

The facility is required to perform groundwater monitoring, perform post-closure care, and is in various stages of corrective action activities which are described in detail in the corrective action Parts of the Permit (Sections 11 & 12). A compliance schedule is included in Permit Section 11.

- **Landfill Disposal**

US Ecology has constructed and is currently operating landfill Trench 11 and was constructed with a double composite liner consisting of a primary liner of HDPE and a secondary liner with a HDPE liner and 6" of soil amended with bentonite. The design was approved as meeting the Minimum Technology Requirements (MTR). The below grade capacity of Trench 11 is 847 acre-feet (1.36 million cubic yards) the above grade capacity of Trench 11 is 400,000 cubic yards. US Ecology proposes to construct an additional trench (Trench 12) and has submitted substantial information regarding the design and configuration of this trench. The 8.81 acre base footprint to be occupied by Trench 12 and the landfill capacity of 745 acre-feet (1.2 million cubic yards) of waste and cover material is approved by this Draft Permit.

- **Tanks Storage**

The tank storage portion of the facility includes five (5) Polychlorinated Biphenyls (PCB's) Storage tanks, three (3) Stabilization tanks, three (3) condensate storage tanks associated with the LTTD Units, and one (1) Leachate Storage tank. The maximum amount and type of wastes that may be handled are discussed in Permit condition 4.1.

- **Tank Treatment**

The maximum amount and type of wastes that may be treated are discussed Permit condition 5.1. The containment system employed for these tanks is discussed in detail in Permit Application Section 10.1.0. There are three (3) Stabilization tanks for the treatment of liquid and metal bearing wastes. A fourth (4th) tank

is used for decontaminating equipment (trucks, etc) and allowing the wash water to evaporate.

- **Thermal Treatment**

The Low Temperature Thermal Desorption Unit(s), are used to treat waste containing petroleum products, Volatile Organic and Semi-Volatile Organic compounds and pesticides(both RCRA regulated and non-regulated). The Thermal Units operate both in atmospheric and negative (high vacuum) environments, under temperature conditions reducing the likelihood of changing the chemical make-up of the waste being treated. The Low Temperature Thermal Desorption Units (LTTD) are used to treat Organic Compounds, (VOCs and SVOCs); and/or Pesticides; and/or Petroleum Hydrocarbons.

- **Container Storage**

US Ecology is permitted to store waste in containers subject to the terms and conditions of this Permit as follows. Containers are managed in the areas noted in the Container Management Plan. Both liquids and solids are accepted and stored for further treatment (no treatment in containers is permitted), disposal, or shipment off-site. The specific management requirements of each area are in the specific section(s) of the application. The following container storage areas are to be permitted: PCB/RCRA Storage, Waste Consolidation and Storage Area #1 (WCSA #1), Waste Consolidation and Storage Area #2 (WCSA #2), Dry Hazardous Waste Storage Area #1 (DHWSA #1), Dry Hazardous Waste Storage Area #2 (DHWSA #2) Bin Storage Area (Secondarily Contained)

TYPES OF WASTE EXPECTED TO BE HANDLED

1. Solvents, Pesticides, Chlorinated Hydrocarbons
2. Reactives, Inorganic Acids/Bases
3. Metals, State regulated wastes
4. Labpacks
5. Containerized soils
6. Contaminated Soil-Remediation waste
7. Contaminated liquids
8. And other waste that will be stored, treated, and disposed at US Ecology which originate from a wide variety of sources including industrial and environmental remediation waste. Any residues or wastes that cannot be disposed or treated onsite must be shipped to an off-site permitted treatment or disposal facility.

This facility will not accept bio-hazardous or radioactive wastes or waste containing dioxins.

BASIS FOR THE PERMIT CONDITIONS

The draft permit conditions are established pursuant to the authority of Section 3006 of the Resource Conservation and Recovery Act (RCRA) (Chapter 40 Code of Federal Regulations as codified in part 271), 40 CFR Parts 124, and 260 through 270, Nevada Revised Statutes (NRS) 459.20 and Nevada Administrative Code (NAC) 444.842 through 444.8746, 444.940 through 444.9555, and 444.960. These laws and regulations govern the management of hazardous wastes in the state of Nevada. NDEP, as the authorized permitting agency for the state of Nevada, has reviewed the permit renewal application submitted by US Ecology and has determined the facility can be operated under the draft permit conditions in accordance with applicable regulations and in a manner which is protective of public health and the environment.

Unit-specific operation and maintenance requirements in the draft permit also contain provisions for: waste analysis for proper management of hazardous waste; contingency plan and preparedness requirements to prevent and respond to releases of hazardous waste; personnel training requirements; inspection and record-keeping requirements; and unit-specific closure requirements. US Ecology is also required to conduct corrective action due to historical (pre-RCRA)

releases of hazardous chemicals at the facility. US Ecology has already initiated corrective action investigations at these sites. The draft permit, which refers to these sites as Solid Waste Management Units (SWMUs), contains an enforceable schedule and requires further remedial activities.

REQUESTED VARIANCES

No Variances were requested for this Permit Renewal

PROCEDURES FOR REACHING A FINAL DECISION

Section 7004(b) of RCRA, NAC 444.8632, and 40 CFR Section 124.10 require that the public and interested agencies be given at least forty-five (45) days to comment on each draft Permit prepared under RCRA. The comment period for the US Ecology NV Inc, (USEN) draft permit will end on **March 15, 2005**. Any person interested in commenting on the application or draft permit must do so within this forty-five day comment period.

The ADMINISTRATIVE RECORD for the DRAFT PERMIT, which includes the APPLICATION, AGENCY AND APPLICANT CORRESPONDENCE AND MEMORANDA, DRAFT PERMIT, and this FACT SHEET, are available for public review between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday at the NDEP offices in Carson City. The compliance history of the applicant may also be viewed during the same hours and location given above.

A copy of the DRAFT PERMIT and Application may also be viewed at the US ecology facility located 11 miles south of Beatty Nevada.

When NDEP makes a final decision to either issue or deny the permit, notice will be given to US Ecology and to each person who has submitted written comments or requested a notice of the final decision. The final permit decision shall become effective thirty (30) days after service of notice of the decision unless a later date is specified or review is requested under NAC 444.8632 and 40 CFR Section 124.19 or an appeal of the NDEP Administrator's decision is brought to the State Environmental Commission under NRS 445.274. If no comments are submitted requesting a change in the draft permit, the final permit shall become effective reflecting the conditions in the draft permit

NAME AND ADDRESS OF PERSON TO CONTACT

1. NDEP Contact: Sree Kailash, (775) 687-9471, E-mail: skailash@ndep.nv.gov
2. Facility Contact: Robert Marchand, General Manager
P.O. Box 578 Beatty, NV 89408, (775) 553-2203 ext. 104, E-mail: bmarchand@americanecology.com

Comments should include all reasonably available references, factual grounds, and supporting material. A public hearing will be held to hear further comments if a written notice of opposition is received and a request for such a hearing is submitted by **March 15, 2005**. In the event that such a public hearing is requested, a time and place for the meeting will be scheduled and announced in a separate public notice at least thirty (30) days prior to the hearing. NDEP will respond in writing to all comments received during the public comment period and statements heard at a public hearing, in the event one is held, when making a final decision.
